

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	:	
David Levaughan Gross,	:	Chapter 13
	:	
Debtor.	:	
	:	Bankr. #13-11718/BIF
	:	
David Levaughan Gross,	:	
Movant,	:	Hearing: November 19, 2013, 11 A.M.
v.	:	
	:	
Estate of Anne Ballinger,	:	Motion of Debtor to Avoid
Respondent.	:	Judicial Lien of Anne Ballinger

NOTICE OF MOTION

David Levaughan Gross has filed papers with the court to Avoid the Lien of (the Estate of) Anne Ballinger in the Chapter 13 bankruptcy case for the reason(s) listed on the enclosed motion.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

1. If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then fourteen (14) days after the date of this notice, you or your attorney must do all of the following:

- (a) File with the court an answer, explaining your position at:

U.S. Bankruptcy Court
900 Market Street, Suite 400
Philadelphia, PA 19107

- (b) mail a copy to the Movant's co-counsel:
Sherri Dicks, Esquire
Law Offices of Sherri R. Dicks, P.C.
Post Office Box 42251
Philadelphia, PA 19101

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above, and attend the hearing, the court may enter an order granting the relief required in the enclosed motion. If you mail your response to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above.

3. A hearing on the motion is scheduled before the **Honorable Bruce I. Fox, United States Bankruptcy Judge**, on **November 19, 2013** at **11 A.M.** in **Courtroom No. 2, United States Bankruptcy Court, Robert N.C. Nix Building, 900 Market Street, Philadelphia, PA 19107-4299.**

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you, if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at (215) 408-2800 to find out whether the hearing has been cancelled because no one filed an answer.

Date: October 21, 2013

/s/Sherri R. Dicks

SHERRI R. DICKS

Counsel for Debtor/Movant

David Levaughan Gross